

December 21, 2007

Mr. Christopher A. Whyrick
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Whyrick:

The Rudy Giuliani Presidential Committee, Inc. (hereinafter "Committee"), FEC ID# C00430512, is in receipt of your Request for Additional Information (RAI) dated November 30, 2007, referencing the October Quarterly FEC Report (7/1/07 - 9/30/07). The Committee's response follows.

Schedule A-P

As previously indicated, in accordance with 11 CFR 110, and as a part of its regular contributions screening process, the Committee reviews each contribution received for possible regulatory related issues. All contributions received by the Committee that exceed the contribution limits are reattributed, redesignated or refunded pursuant to the procedures and time frame limits set forth in 11 CFR 110.1(k)(3)(ii)B, 11 CFR 110.1(b)(3)(i), and 11 CFR 110.1(b)(3)(i). In addition, the Committee takes the additional step of noting, via memo text language associated with each such transaction entry, that the Committee is taking all reasonable actions to remedy any potential contribution limit issue.

We have reviewed the listing of contributors on the RAI addendum titled "Excessive and/or Prohibited Contributions." Any necessary changes have been reflected on the amended October Quarterly filed on December 21, 2007. For all other donors on the list, as noted in the memo text for each relevant transaction on the original October Quarterly, a reattribution, redesignation, or a refund has been processed during the fourth quarter and those transactions will be reported properly on the Committee's Year-End report.

Schedule B-P

Schedule B-P - Description Purposes

11 CFR 104.3(b)(3)(i)(B) provides several examples of acceptable purposes that committees may use in describing disbursement transactions on financial disclosure reports. In addition, in an effort to comply with both the text and spirit of the public disclosure regulations, the Committee has consulted the Commission's Statement of Policy on Purpose of Disbursement reporting, 72 FR 887 (1/9/07) "Examples of Inadequate Purposes" list, which was revised on 3/5/07 and publicly disseminated by the Commission. Using these sources, the Committee has described the transactions cited in the RAI in accordance with all published guidelines that are available to the regulated community. Moreover, there is no indication in the regulations or Commission guidelines that the amount of a particular expenditure requires any different consideration with respect to the list of sufficient or insufficient descriptions for the purpose of disbursement. As such, the Committee believes that it has satisfied the legal requirements to itemize completely the referenced disbursement transactions on its October 2007 Quarterly Report and that no additional clarification is required.

Schedule B-P - Travel and Subsistence Advances
